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*Counsel for Plaintiff in Gloria Stricklin Trust v.
Zuckerberg, et al., No. 18-cv-2011*

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

LAUREN PRICE, individually and on behalf of
all others similarly situated,

Plaintiff

v.
FACEBOOK, INC. and CAMBRIDGE
ANALYTICA

Defendants,

Case No. 18-cv-1732-VC

Related Consumer Cases:
18-cv-1852-VC
18-cv-1891-VC
18-cv-1915-VC
18-cv-1953-VC
18-cv-1984-VC

Proposed Related Derivative Cases:
18-cv-1792-HSG
18-cv-1834-WHA
18-cv-1893-VC
18-cv-1929-EJD
18-cv-2011-JSC

**PLAINTIFF GLORIA STRICKLIN
TRUST'S RESPONSE IN SUPPORT
OF PLAINTIFF NATALIE
OCEGUEDA'S ADMINISTRATIVE
MOTION TO CONSIDER
WHETHER CASES SHOULD BE
RELATED**

Judge: Hon. Vince Chhabria

1 In accordance with Local Rules 3-12(e) and 7-11(b), Plaintiff Gloria Stricklin Trust
 2 (“Plaintiff Stricklin Trust”)—which filed a shareholder derivative action on behalf of Facebook,
 3 Inc. (“Facebook”), *Stricklin Trust v. Zuckerberg, et al.*, No. 18-cv-02011-JSC (N.D. Cal.)—
 4 respectfully submits this response in support of Plaintiff Natalie Ocegueda’s Administrative
 5 Motion to Consider Whether Cases Should be Related (ECF No. 29). For the reasons stated in
 6 Plaintiff Hallisey’s Response in Support of Plaintiff Ocegueda’s Motion (ECF No. 31), Plaintiff
 7 Stricklin Trust agrees that the *consumer class actions* that were related by this Court on April 6,
 8 2018 (ECF No. 27) should be related to the *shareholder derivative actions* brought on behalf of
 9 Facebook that are currently pending in this District. These matters include:

CONSUMER CLASS ACTIONS¹		
Case Name	Case No.	Assignment
<i>Rubin v. Facebook, Inc.</i>	18-cv-1852-VC	Hon. Vince Chhabria (San Francisco)
<i>Gennock v. Facebook, Inc.</i>	18-cv-1891-VC	
<i>O’Kelly v. Facebook, Inc.</i>	18-cv-1915-VC	
<i>Beiner v. Facebook, Inc.</i>	18-cv-1953-VC	
<i>Haslinger v. Facebook, Inc.</i>	18-cv-1984-VC	

DERIVATIVE ACTIONS		
Case Name	Case No.	Assignment
<i>Hallisey v. Zuckerberg, et al.</i>	18-cv-1792-HSG	Hon. Haywood Gilliam (Oakland)
<i>Martin v. Zuckerberg, et al.</i>	18-cv-1834-WHA	Hon. William Alsup (San Francisco)
<i>Ocegueda v. Facebook, et al.</i>	18-cv-1892-VC	Hon. Vince Chhabria (San Francisco)
<i>Karon v. Zuckerberg, et al.</i>	18-cv-1929-EJD	Hon. Edward Davila (San Jose)
<i>Stricklin Trust v. Zuckerberg</i>	18-cv-2011-JSC	Hon. Jacqueline Corley (San Francisco)

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 27 ¹ On April 9, 2018, the Honorable Yvonne Gonzalez Rogers filed on this docket an order
 28 of referral to determine whether *Kooser, et al. v. Facebook, Inc., et al.*, No. 18-cv-2009, is related
 to the *Price, Beiner, Rubin, Gennock, O’Kelly*, and *Haslinger* matters (ECF No. 30).

1 Relating these consumer class actions and derivative matters is appropriate under Local
 2 Rule 3-12(a) because (i) they involve substantially the same parties and subject matter and (ii) it
 3 appears likely that there will be an unduly burdensome duplication of labor and expense or
 4 conflicting results if the cases are conducted before different judges. The consumer class
 5 actions and derivative matters involve the same defendant (or nominal defendant), Facebook,
 6 and the claims arise from substantially similar circumstances. Specifically, the consumer class
 7 actions and the derivative matters allege that Facebook improperly permitted third parties to
 8 access the personal data of millions of Facebook users without their consent, enabling
 9 Cambridge Analytica to exploit this private information to target voters online in advance of the
 10 2016 United States Presidential Election. *See, e.g., Price Complaint at ¶¶4, 10, 15, 22; Stricklin*
 11 *Trust Complaint at ¶¶5-11; 46-48.* In light of these similar factual issues, it is likely that
 12 discovery will significantly overlap. Relating these matters will conserve resources by ensuring
 13 that discovery is coordinated and not duplicated.²

14 Furthermore, the consumer class actions and derivative matters share some of the same
 15 legal issues, including whether Facebook violated state and federal statutes by mishandling user
 16 data. The consumer class actions and derivative matters seek similar relief, including damages
 17 and injunctive relief related to Facebook's deficient data-security practices and policies that
 18 allowed Cambridge Analytica to obtain users' information. *See, e.g., Price Complaint at ¶¶32,*
 19 *41, 46; Stricklin Trust Complaint at ¶¶107, 110, 114.* As a result, having the consumer class
 20 actions and derivative matters related avoids the risk of inconsistent pre-trial rulings.

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27 ² On March 30 and April 3, 2018, the Honorable Edward J. Davila issued orders, without
 28 written opinions, declining to relate two of the derivative actions, *Hallisey* and *Ocegueda*, to the
 federal securities fraud class action pending in this District. *See, Yuan v. Facebook*, No. 18-cv-
 1725-EJD (ECF Nos. 8 and 13).

1 Plaintiff Stricklin Trust supports the administrative motion to relate the consumer class
2 actions and derivative matters as promoting judicial economy and efficiency.

3 DATED: April 11, 2018

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